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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SANDY ALECIA SINCLAIR-LEWIS,
individually;

CASE NO. 2:20-cv-02063-JCM-VCF

Plaintiffs,

vs.

SMITH'S FOOD & DRUG CENTERS, INC. an
Ohio Corporation; DOES I - X, and ROE
CORPORATIONS I - X, inclusive,

Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(Second Request)

Pursuant to LR 6.1 and LR 26.4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case ninety (90) days as set forth below:

Discovery Completed:

1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
2. Plaintiff served Defendants with Interrogatories, Request for Admissions, and Requests for Production of Documents.
3. Defendant served Plaintiff with Interrogatories, Request for Admissions, and Request for Production of Documents.
4. Deposition of Plaintiff
5. Deposition of Plaintiff's husband.

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Discovery that remains to be completed:

1. Deposition of the Rule 30(b)(6) witness on behalf of the Defendant.
2. Deposition of Plaintiff's treating physicians.
3. Continue to collect Plaintiff's medical records
4. Both parties need to disclose experts.
5. Both parties need to depose the experts disclosed.
6. Inspection of the Defendant's premises.

Reasons that Discovery has not yet been completed are:

The parties have been diligently pursuing discovery, however, the parties' current schedule, combined with the issues surrounding the COVID-19 pandemic has not permitted the aforementioned discovery to take place before the existing deadlines.

Therefore, the parties request an additional ninety (90) days extension so that they can complete the remaining discovery around the COVID-19 restrictions. This request is not made in bad faith, with dilatory motive, or for any purposes of improper delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct the remaining discovery, given the vast amount of information and substantial damages at issue.

Proposed schedule for completing discovery:

Accordingly, the parties request the discovery deadlines be extended to allow ample time for the court to make its ruling and allow the parties to complete the remaining discovery.

The following is a list of discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Amend Pleadings and Add Parties	June 4, 2021	No Extension
Initial Disclosure of Experts	October 4, 2020	January 10, 2022
Disclosure of Rebuttal Experts	November 2, 2021	February 9, 2022
Discovery Cut-Off	December 2, 2021	March 11, 2022
Dispositive Motions	January 3, 2022	April 11, 2022
Joint Proposed Pre-Trial Order	February 2, 2022	May 11, 2022

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WHEREFORE, the parties respectfully request this honorable Court adopt the foregoing stipulation of the parties which will result in the new discovery deadlines.

ER INJURY ATTORNEYS

COOPER LEVENSON, P.A.

By: /s/ Justin G. Randall

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By: /s/ Andre T. Marques

Andre T. Marques, Esq.
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Attorney for Defendants

ORDER

IT IS SO ORDERED that the discovery deadlines are hereby extended as follows:

Scheduled Event	New Deadlines
Amend Pleadings and Add Parties	No Extension
Initial Disclosure of Experts	January 10, 2022
Disclosure of Rebuttal Experts	February 9, 2022
Discovery Cut-Off	March 11, 2022
Dispositive Motions	April 11, 2022
Joint Proposed Pre-Trial Order	May 11, 2022

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 29th day of September, 2021.

UNITED STATES MAGISTRATE JUDGE

ER INJURY ATTORNEYS

By: /s/ Justin G. Randall

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